## DECLARATION OF EARLE C. COOLEY

1 I, Earle C. Cooley, hereby declare and state: 2 1. I am an attorney-at-law admitted to practice in all 3 courts of the Commonwealth of Massachusetts, the United States 4 District Court for the District of Massachusetts, several 5 United States Courts of Appeals and the Supreme Court of the 6 United States. I am President and senior member of the lawfirm 7 of Cooley, Manion, Moore & Jones, P.C., in Boston, 8 I have personal knowledge of the facts set forth Massachusetts. 9 below and, if called as a witness, could and would competently 10 testify thereto. 11 I have been counsel for the Church of Scientology 2. 12 International, other churches of Scientology and Religious 13 Technology Center since October, 1984. In this capacity I have 14 had occasional contact with Michael J. Flynn, who, in the early 15 1980's, was a principle counsel in many lawsuits against various 16 churches of Scientology and prominent individuals associated 17 with the religion of Scientology. 18

On Tuesday, April 28, 1992 I spoke on the telephone 3. 19 with Michael J. Flynn. I explained that Gerald Armstrong had 20 stated in declarations that he had been been pressured into 21 signing the Settlement Agreement with the Church of Scientology 22 International in 1986 and had been told by Flynn that the 23 Agreement was "not worth the paper it was written on". 24

Mr. Flynn denied these allegations and explained to me 4. 25 that Armstrong was not coerced by anyone to sign the Agreement. 26 He made it clear that he had informed Armstrong that the 27 Argeement was valid on its face and stated unequivocally that 28

1	he had not made the statement to Armstrong described in
1 2	paragraph 3, above.
2	5. Mr. Flynn discussed with me the fact that Armstrong was
4	well informed by counsel regarding the validity of the
5	Settlement Agreements and the particulars of key terms about
6	which Armstrong is attempting to create controversy.
7	I declare under the penalty of perjury of the laws of the
8	the Commonwealth of Massachusetts that the foregoing is true
9	and correct.
10	Executed this 14th day of May, 1992 at Boston,
11	Massachusetts.
12	parle C. Cody
13	EARLE C. COOLEY
14	×
15	
16	
17	
18	
19	
20	
21 22	
22 23	
24	
25	
26	
27	
28	
	-2-

•

••